

Message

From: Garwood, Gerri [Garwood.Gerri@epa.gov]
Sent: 12/18/2017 7:06:34 PM
To: Thompson, Lisa [Thompson.Lisa@epa.gov]
Subject: RE: Drone Application to NSPS OOOOa Fugitive Component Monitoring

We actually did change it with the thoughts of drones in mind...that's why it went from walking path to observation path. But the drone is going to have to be close enough to see the components. There needs to be some max distance, just like a person would have (which should be spelled out in the site specific plan).

Gerri
919-541-2406

From: Thompson, Lisa
Sent: Monday, December 18, 2017 10:14 AM
To: Garwood, Gerri <Garwood.Gerri@epa.gov>
Subject: FW: Drone Application to NSPS OOOOa Fugitive Component Monitoring

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From: Marsh, Karen
Sent: Monday, December 18, 2017 10:07 AM
To: kmacoskey@cecinc.com
Cc: Celender, Rick <rcelender@cecinc.com>; Kuhlman, Dustin <dkuhlman@cecinc.com>; Szwed, Dan <dszwed@cecinc.com>; Coy, Zachary <zcoy@cecinc.com>; Lantz, Brian <blantz@cecinc.com>; Thompson, Lisa <Thompson.Lisa@epa.gov>
Subject: FW: Drone Application to NSPS OOOOa Fugitive Component Monitoring

Kris,

Lisa Thompson forwarded me your email regarding the use of drones for OOOOa fugitive emissions monitoring. The language in 60.5397a was written with drone-mounted OGI in mind. One key aspect is ensuring you have a line of sight on all regulated components, which is why the observation path is an important aspect of the monitoring plan. Provided the requirements of 60.5397a are met, this is a valid method for fugitive monitoring.

Please let me know if you have any other questions.

Thanks,
Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
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From: Macoskey, Kris [<mailto:kmacoskey@cecinc.com>]
Sent: Thursday, December 14, 2017 12:05 PM

To: Thompson, Lisa <Thompson.Lisa@epa.gov>

Cc: Celender, Rick <rcelender@cecinc.com>; Kuhlman, Dustin <dkuhlman@cecinc.com>; Szwed, Dan <dszwed@cecinc.com>; Coy, Zachary <zcoy@cecinc.com>; Lantz, Brian <blantz@cecinc.com>

Subject: Drone Application to NSPS OOOOa Fugitive Component Monitoring

Hi Lisa – it was nice chatting with you earlier today.

As I explained, CEC is exploring the use of drone technology to perform OGI surveys at well sites for compliance with the NSPS OOOOa fugitive emission component LDAR requirements (40 CFR 60.5397a).

Assuming that the applicable requirements of the rule are met, does U.S. EPA have any prohibition or limitation about using drone-mounted OGI cameras for these surveys?

Thanks very much,

Kris

Kristian A. Macoskey, QEP

Senior Air Quality Consultant / Vice President

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